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ENV-CP-AP-200

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## Environment, Safety, Health Directorate

## Environmental Compliance Program

## Administrative Procedure

# Regulatory Procedure Review of Waste Management Procedures

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#### REVISION HISTORY

<b>Document Number and Revision</b> <i>[Include revision number, beginning with Revision 0]</i>	<b>Effective Date</b> <i>[Document Control Coordinator inserts effective date]</i>	<b>Description of Changes</b> <i>[List specific changes made since the previous revision]</i>
ENV-CP-AP-200, R0	07/21/2015	New Document
ENV-CP-AP-200, R1	09/15/2015	Updated document to include procedure reviews done electronically in DRS, deleted references to QA Specialist, and updated information on training requirements.

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## **1.0 INTRODUCTION**

Environmental Compliance Programs (ENV-CP) has implemented a formalized approach to conducting procedure reviews to ensure all procedures related to waste generation, management and treatment are compliant with the LANL Hazardous Waste Facility Permit; the New Mexico Hazardous Waste Act; the New Mexico Hazardous Waste Management Regulations and the Resource Conservation and Recovery Act (RCRA).

### **1.1 Purpose**

The purpose of this document is to standardize ENV-CP review process for procedures that address the generation, and management of solid waste, hazardous waste, radioactive waste, mixed solid/radioactive waste, environmental cleanup waste, demolition and disposal (D&D) and investigation derived wastes (IDW).

### **1.2 Scope and Applicability**

The scope of this document encompasses procedures related to waste generation, management, treatment; and, operation of waste management facilities. It includes maintenance of permitted facilities and systems of treatment and control installed or used to achieve compliance with the conditions of the Permit. This procedure review process applies to current procedures, new procedures and procedure reviews initiated internally by ENV-CP outside of an established review cycle.

### **1.3 Procedure Review Checklist**

Due to the complexity of the Permit contents, it would be cumbersome to address all criteria in the "Procedure Review Checklist" (Attachment 1). It will be the responsibility for each reviewer to validate the procedure to the requirements in the Permit.

Question 9 of the checklist is generic in nature, but can address any area of the permit including but not limited to:

- Permit conditions/modification
- Unpermitted conditions
- Design, construction, maintenance and/or operation of the facility (authorized wastes, land disposal restrictions (LDR), inspections, etc.)
- Hazardous waste storage requirements
- Waste characterization requirements
- Preparedness and prevention
- Contingency plans
- Storage in Containers (container condition, compatibility, labeling, free liquids, volatile organic emissions)
- Building specific permit requirements

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## 2.0 Procedure Description Process

1. Perform the review utilizing Attachment 1, "Procedure Review Checklist."
2. Utilize the "Document Review and Concurrence Form" located at:  
<http://int.lanl.gov/org/padops/adesh/operations-integration/assets/docs/doc-review-concurrence-form.pdf>  
Provide to the ENV-CP, Point of Contact (POC) to enter comments into the Document Review System (DRS), mark up phase.
3. Review the revised, verification phase or proposed new procedures, or as appropriate, attend review meetings with cognizant Subject Matter Experts (SMEs) to ensure compliance requirements are incorporated and addressed as necessary.  
**NOTE:** The "disposition" of the comments will be done in DRS by the RLM.
- 4a. If the procedure requires a revision but does not pose an immediate environmental non-compliance, provide comments to the procedure writer and maintain a history file of the changes pending a formal scheduled procedure review. This information will be maintained in the "Waste Management-RCRA-Treatment Tracking Procedures" spreadsheet.
- 4b. If the procedure incorrectly addresses a potential or known environmental regulatory compliance issue, and is an active procedure, immediately notify the procedure writer. If the procedure writer is unable to coordinate review of the procedure with potential violations, notify Environmental Compliance Group Leader (ENV-CP GL) for immediate attention to the Responsible Line Manager (RLM).
5. Verify final approved procedure when issued on Documentum.
6. The ENV-CP POC will upload and track Procedure Review Checklists, Document and Concurrence forms, and any other review documents from other reviewers. Copies will be located on the RCRA Server:/RCRA TEAM RECORDS/PERMIT DOCUMENTS/PROCEDURE REVIEWS.

## 3.0 RESPONSIBILITIES

Any ENV-CP procedure reviewer who determines there may be a non-compliant procedure or regulatory violation that requires a new or revised procedure, shall at a minimum, immediately notify the ENV Compliance Group Leader (ENV-CP GL) and/or RCRA Permitting/ Compliance Team Leader (ENV-CP TL).

### 3.1 ENV-CP Procedure Reviewer POC

1. Coordinate dissemination of procedures for review.
2. Compile and resolve comments gathered from ENV-CP reviewers.
3. Enter group comments into DRS and participate with other SMEs in resolving comments ensuring that deficiencies pertaining to environmental compliance are addressed.

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4. Upload all comment documentation to the RCRA Server: /RCRA TEAM RECORDS/PERMIT DOCUMENTS/PROCEDURE REVIEWS.
5. Maintain Procedure Review Official Documents (PROD) database of all procedures and review status.

### **3.2 ENV-CP Procedure Reviewers**

1. Complete Attachment 1, "Procedure Review Checklist".
2. Complete "Document Review and Concurrence Form" located on the ADESH homepage (referenced in Section 2.1.2 above).
3. Submit Attachments documenting procedure review to ENV-CP Procedure Reviewer POC.
4. Coordinate with other SMEs either internally or externally on areas needing clarification or of concern.

### **3.3 Environmental Compliance Programs Group Leader/RCRA Permitting/Compliance Team Leader**

1. In the event of a notification of a noncompliant procedure or regulatory violation, make necessary notifications to appropriate management and individuals responsible for reporting to external agencies (i.e., DOE, NMED etc.).
2. Raise attention to procedures not up for scheduled review that may contain a potential or known environmental regulatory compliance issue to Responsible Supervisor/Manager.

### **3.4 Responsible Supervisor/Manager with Procedure with Potential Noncompliance**

1. After notification from ENV-CP GL or ENV-CP TL of potential non-compliance initiate necessary action until the procedure is corrected (i.e., stop work or pause in operations).
2. Initiate procedure review and revision process.
3. Approve corrected and revised procedure.

## **4.0 TRAINING AND OTHER REQUIREMENTS FOR IMPLEMENTATION**

The training courses listed in this section are required for all ENV-CP personnel who review procedures for environmental compliance. Personnel working to this procedure must be assigned to Curriculum 5135, complete all applicable training requirements, and be authorized by ENV-CP management. In addition, it may be required to complete other site specific training when reviewing other Non-ENV procedures. The following Conduct of Operations self-study courses are also recommended: #27366, *OS-RTS ConOps*, *Technical Procedure Writer's Manual*, #24668, *OS-RTS ConOps Briefing*, *Attachment 16, Technical Procedures* and #24690, *OS-RTS: Use Every Time vs. Reference Procedures*.



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#### 4.1 Training Prerequisites

Curriculum 5135, WQ8A030A: *ENV-CP Procedure Review Team*

1. Course 7488, *RCRA Personnel Training*
2. Course 23263, *Waste Generation Overview Live*
3. Course 28582, *RCRA Refresher (Self-Study)* (365-day retraining requirement)

#### 4.2 Non-Training Prerequisites

1. Knowledge of applicable regulatory drivers/requirements
2. RCRA Compliance Briefing, "What is Hazardous Waste Treatment?"

#### 5.0 DEFINITIONS AND ACRONYMS

**Secondary job waste** – means miscellaneous materials associated with waste processing that may be placed into daughter drums during repackaging or comingled with the primary waste stream. Examples of secondary waste includes gloves, tools, rags, wipes (Kimwipes), plastic labels, tags, personal protective equipment (PPE), plastic sheeting used for contamination control, and original packaging material (e.g., plastic bags, plywood sheathing, rigid liner lids cut into pieces).

For any other definitions refer to:

- RCRA regs (40 CFR 260.10)

<http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol25/pdf/CFR-2010-title40-vol25-sec260-10.pdf>

- LANL Permit (section 1.8, permit page 15)

<https://cloud.env.nm.gov/waste/?c=236&k=3c06f97632>

or

[https://adep.lanl.gov/adepimageslib/WebDocs/Final\\_LANL\\_RCRA\\_Permit\\_full.pdf](https://adep.lanl.gov/adepimageslib/WebDocs/Final_LANL_RCRA_Permit_full.pdf)

- P409 tool (Glossary)

[http://int.lanl.gov/org/padops/adesh/environmental-protection/\\_assets/docs/rcra/tools/ENV-RCRA-TOOL-101.pdf](http://int.lanl.gov/org/padops/adesh/environmental-protection/_assets/docs/rcra/tools/ENV-RCRA-TOOL-101.pdf)

[http://int.lanl.gov/org/padops/adesh/environmental-protection/\\_assets/docs/rcra/tools/ADESH-TOOL-700.pdf](http://int.lanl.gov/org/padops/adesh/environmental-protection/_assets/docs/rcra/tools/ADESH-TOOL-700.pdf)

- NOTE ALSO: some individual P409 tools contain definitions, e.g., elementary neutralization (901), absorption w/o permit (902), stabilization treatment (903), Permitted Storage Requirements (802), etc.

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## 5.1 Acronyms

See LANL [Acronym Master List](#).

ADESH	Associate Directorate for Environment, Safety and Health
ENV-CP	Environmental Compliance Programs
ENV-CP-GL	Environmental Compliance Group Leader
ENV-CP-TL	RCRA Permitting/ Compliance Team Leader
ENV-QA	Environmental Quality
FOD	Facility Operations Director
LANL or the Laboratory	Los Alamos National Laboratory
NMED	New Mexico Environmental Department
POC	Point of Contact
PROD	Production
RCRA	Resource Conservation and Recovery Act
RM/RLM	Responsible Manager/Responsible Line Manager
SME	Subject Matter Expert
SOM	Shift Operations Manager
SOS	Shift Operations Supervisor
TA	Technical Area

## 6.0 RECORDS

Records generated by this document will be submitted to [Records](#) for document management in accordance with requirements of P1020-1, *Laboratory Records Management Program*, P300, *Integrated Work Management*, P315, *Conduct of Operations Manual* and with the ADESH-AP-006, *Records Management Plan*. In addition, the ENV-CP POC will upload all document review paperwork to the ENV-CP share drive.

## 7.0 REFERENCES

- LANL P315, *Conduct of Operations Manual*
- P1020-1, *Laboratory Records Management*
- P300, *Integrated Work Management*
- ADESH-AP-006, *ES&H Records Management Plan*
- LANL Hazardous Waste Facility Permit

## 8.0 ATTACHMENTS OR APPENDICES

- **Attachment 1:** *Procedure Review Checklist*

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### ATTACHMENT 1 – PROCEDURE REVIEW CHECKLIST

Procedure Review Checklist			
Document Number:	Document Title:	Revision	Date:
<b>Procedure Content</b>			
1. Is the purpose and objective of the procedure clearly identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
2. Is the skill level / training necessary to perform the procedure clearly identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
3. Does the procedure contain all information and level of detail necessary to perform the activity?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
4. Does it appear that necessary PPE, hazards to personnel, special tools, and equipment are identified in the procedure?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
5. Are secondary job wastes and control measures described in the procedure?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
6. Have steps or information been omitted that are necessary to perform the activity?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
7. Are Notes, Cautions or Warning statements clearly distinguishable from the action steps?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
8. Does the procedure identify what to do if abnormal conditions or reactions should arise and appropriate action(s) to be taken in the event of an unexpected occurrence?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
<b>Permit Compliance</b>			
1. Does any part of the procedure process meet the definition of treatment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
2. Are any of the eight exemptions of the treatment permitting requirements met?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
3. (a) Does the procedure include actions for free liquids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
(b) Does the procedure require the absorption of free liquids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
(c) Is a compliant (compatible) absorbent called out in the procedure?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
4. Is the process in question being performed in a Permitted Unit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
(a) Does the Permitted Unit have a permit for absorption?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
(b) Does the activity involve resizing for waste management purposes and have a permit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
5. Does the procedure require the neutralization of free liquids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
6. (a) Does the process meet the definition of elementary neutralization (i.e. only D002 code, process performed in an elementary neutralization unit (ENU))?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		
(b) Does the Permitted Unit have a permit for neutralization?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA		

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**Procedure Review Checklist**

7. If the procedure includes treatment of waste, do the attachments include log sheets that sufficiently document the treatment process including, but not limited to:
- the waste treated;
  - beginning & final pH;
  - treatment method(s);
  - type and amount of neutralizer or absorbent used; and
  - product name and manufacturer of all materials added to the waste.

☐ Yes ☐ No ☐ NA

8. Will the procedure require notification to NMED or a modification to the Permit?

☐ Yes ☐ No ☐ NA

9. Are any other actions in the procedure regulated under the permit?  
What are the actions?

☐ Yes ☐ No ☐ NA

Are they permit compliant and why?

☐ Yes ☐ No ☐ NA

\*If a generator is treating waste without interim status or a RCRA permit, ensure it meets one of the treatment standards without a permit.

10. If the procedure impacts the facility operating record, are the necessary entries, updates, or corrections addressed (e.g. WCATS updates)?

☐ Yes ☐ No ☐ NA

11. Does it appear all organizations that need to review the procedure are on the distribution?

☐ Yes ☐ No ☐ NA

Additional comments:

ENV-CP review of this procedure has been completed.

\_\_\_\_\_  
Reviewer Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Z Number

\_\_\_\_\_  
Date